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Supplemental Comments
for the Illinois Commerce Commission
Initiative on Plug-In Electric Vehicles
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About the ISTC

Our goal at the Illinois Science & Technology Coalition is to cultivate economic development in Illinois by increasing resources for Research, Development and innovation (RDI) initiatives at Illinois-based institutions and businesses.

Mission

As the only organization representing the full range of science and technology activity in Illinois, our mission is to:

- Foster public-private partnerships to develop and execute RDI projects.
- Advocate for funding for RDI initiatives; and
- Collaborate with public and private partners to attract and retain RDI resources and talent in Illinois.



The appropriate regulatory paradigm (if any) for private and public charging stations.

It is our belief that the goals of mass consumer adoption of electric vehicles (EVs) are to promote economic development in Illinois and provide environmental benefits through reduction in the use of petroleum based fuels.

In order to enable these benefits we recommend the Commissioners both examine current statute and explore new policy options.

The Illinois Public Utilities Act, 220 ILCS 5 Article 16, already defines alternative retail electricity suppliers (ARES) to include resellers of electricity. We believe the charging of EVs by fixed charging infrastructure vendors falls under this statute. The Commissioners, through policy and practice, should explore the feasibility of charging infrastructure vendors registering ARES. We are concerned with the impact of defining charging infrastructure vendors as a “competitive service” as defined by the Electric Service Customer Choice and Rate Relief Law of 1997.

As consumers shift from petroleum to electricity for the powering of their motor vehicles there will be a corresponding decrease in the motor fuel taxes collected and used to support the road fund. However, it is anticipated that there will be a corresponding increase in the taxes collected on electricity. The Commissioners should



encourage a policy process that values this revenue source and establishes a protocol to ensure it supports infrastructure beneficial to the motoring public.

In order to facilitate the charging of electric vehicles that provides the maximum societal environmental and economic benefits, what modifications (if any) should be made to existing utility rates? In addition, what metering options and charges should be considered while taking into account the existence of competitive retail suppliers?

Current regulatory frameworks and rate structures appear to be sufficient to accommodate the introduction of EVs. Consumer education about the types of rates available, particularly, real-time-pricing must be made available in a clear, concise way for EV sellers, purchasers and owners.

To maximize environmental benefits, the Commissioners should encourage regulated entities to explore potential pricing mechanisms to encourage the integration renewable energy and vehicle-to-grid technologies to mitigate of the intermittency of renewable energy sources and take advantage of the existing model benefits of off-peak pricing.

Further, the Commissioners should explore encouraging all EV users to evaluate the benefits and potential pairing of EV ownership with digital smart meters.

What cost causation and rate design modifications will be required to handle distribution upgrades for increased penetration of higher voltage at-home charging?

The Commissioners should consider the potential merits of a time-of-use rate to support only necessary investments to the distribution network and provide EV owners with all necessary consumer education to understand the corresponding rate structures.

The Commissioners should also explore working with the Illinois Secretary of State's Division of Motor vehicles to determine how to best notify regulated entities when EVs are purchased so that grid load can be properly monitored and managed.

Which costs, if any, should be socialized and why (rationale, benefits, etc.)? Assuming there are costs to be socialized, what are the proper methods for such allocation?

As appropriate and as directly attributable, cost for EVs and EV infrastructure should be borne by the user through consumption driven revenue models.

As consumer adoption moves beyond fleets and single family homes, there is the possibility of socialized cost in multi-unit buildings, both condominiums and rentals.

In condominium buildings charging will likely occur on a common meter allowing the condo boards to assign costs internally through consumption-driven revenue models. In rental buildings, charging will also likely occur on a common meter. Renters may be



asked to support these costs via rent or resident utility charge, if applicable, in order to provide an amenity to the building.

Respectfully Submitted,

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